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*Attorneys for Debtors and Debtors in Possession*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**In re:**

**PG&E CORPORATION,**

**- and -**

**PACIFIC GAS AND ELECTRIC  
COMPANY,**

**Debtors.**

- ☐ Affects PG&E Corporation  
☐ Affects Pacific Gas and Electric Company  
☒ Affects both Debtors

*\* All papers shall be filed in the lead case,  
No. 19-30088 (DM)*

Bankruptcy Case  
No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**STIPULATION BETWEEN DEBTORS  
AND UNITED STATES TRUSTEE  
EXTENDING TIME TO RESPOND TO  
WILDFIRE ASSISTANCE PROGRAM  
MOTION**

**[Related to Dkt. No. 1777]**

**[No Hearing Requested]**

1 This stipulation and agreement for order (“**Stipulation and Agreement for Order**”) is  
2 entered into by PG&E Corporation and Pacific Gas and Electric Company, as debtors and  
3 debtors in possession (collectively, the “**Debtors**”) and the Office of the United States Trustee  
4 (the “**U.S. Trustee**”). The Debtors and the U.S. Trustee are referred to in this Stipulation and  
5 Agreement for Order collectively as the “**Parties**,” and each as a “**Party**.” The Parties hereby  
6 stipulate and agree as follows:

7 **RECITALS**

8 A. On May 1, 2019, the Debtors filed the *Motion Pursuant to 11 U.S.C. §§ 105(a)*  
9 *and 363(b) and Fed. Bankr. P. 2002 and 6004(h) for an Order (a) Authorizing Debtors to*  
10 *Establish and Fund Program to Assist Wildfire Claimants with Alternative Living Expenses and*  
11 *Other Urgent Needs and (b) Granting Related Relief* [Dkt No. 1777] (the “**Wildfire Assistance**  
12 **Program Motion**”), which is set for a hearing before the Court at 9:30 a.m. on May 22, 2019.  
13 Any response or opposition to the Wildfire Assistance Program Motion was due by 4:00 p.m.  
14 (Pacific Time) May 15, 2019 (“**Response Deadline**”).

15 B. On May 15, 2019, prior to the Response Deadline, Counsel for the U.S. Trustee  
16 requested, and counsel for the Debtors agreed, that the time for the U.S. Trustee to respond to the  
17 Wildfire Assistance Program Motion be further extended.

18 **NOW, THEREFORE, UPON THE FOREGOING RECITALS, WHICH ARE**  
19 **INCORPORATED AS THOUGH FULLY SET FORTH HEREIN, IT HEREBY IS**  
20 **STIPULATED AND AGREED, BY AND BETWEEN THE PARTIES, THROUGH THE**  
21 **UNDERSIGNED, AND THE PARTIES JOINTLY REQUEST THE COURT TO ORDER,**  
22 **THAT:**

23 1. The time for the U.S. Trustee to file and serve any response or opposition  
24 to the Wildfire Assistance Program Motion is extended through 12:00 p.m. (Pacific Time) on  
25 May 17, 2019.

26 [Signatures on next page]  
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Dated: May 16, 2019

KELLER & BENVENUTTI LLP

/s/ Thomas B. Rupp

Thomas B. Rupp

*Attorneys for Debtors  
and Debtors in Possession*

Dated: May 16, 2019

OFFICE OF THE UNITED STATES  
TRUSTEE

/s/ Marta E. Villacorta

Marta E. Villacorta

*Trial Attorney  
Attorney for Andrew R. Vara,  
Acting United States Trustee for Region 3<sup>1</sup>*

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<sup>1</sup> Andrew R. Vara, Acting United States Trustee for Region 3, is acting in this appointment for Tracy Hope Davis, United States Trustee for Region 17, who is recused from the above-captioned cases.